

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

No. C 14-01781 WHA

v.

1.41 ACRES OF LAND, more or less, situated
in the City of Alameda, Alameda County, State
of California, and THE STATE OF
CALIFORNIA, acting by and through its
Department of Parks and Recreation, and the
EAST BAY REGIONAL PARK DISTRICT,

REQUEST FOR SUBMISSION

Defendants.

The United States has filed a motion for partial summary judgment, set for a hearing in April 2015. It would be helpful if the parties could please file a joint statement (printed in color with exhibit tabs), appending the following items, by **MARCH 24 AT NOON**:

1. A map in color with labels for the various items in play (*i.e.*, Alameda Federal Center, vacant parcel, Crown Beach, McKay Avenue, Neptune Pointe). Please clearly highlight (or denote) the boundaries of the property to be condemned (that is, the portion of McKay Avenue at issue here). The Court sees the maps provided by the United States at Dkt. Nos. 56 at 9 (color), 56-3 at 39 (color), 56-3 at 57 (black-and-white), 57-1 at 32 (black-and-white), and 1 at 6-7 (black-and-white) but it would be helpful to have one (or two) agreed-upon maps that best represent the property at issue. Please print this agreed-upon map on a large posterboard and bring it to the April 2015 hearing.

2. An authenticated copy of the quitclaim deed recorded in 1961.


3. An authenticated copy of the operating agreement between East Bay Regional Park District and the State of California for Crown Beach and McKay Avenue.

1 4. An authenticated copy of the General Services Administration's "invitation for
2 bids" in its online auction to sell Neptune Pointe in 2011.

3 5. A copy of the proposal submitted to the Office of Management and Budget under
4 the Relocation Program referenced in the declaration of Clark Van Epps (Dkt. No. 56-3,
5 Van Epps Decl. ¶¶ 3-4).

6 6. The emails appended to the declaration of Charlene Larson (Dkt. No. 56-2,
7 Larson Exhs. A, B) appear to be in response to "emails of October 31, 2008 and
8 November 4, 2008" and an "email of November 10, 2008." Do we have those emails? If so,
9 please include a copy of those emails.

10
11 Dated: March 9, 2015.



WILLIAM ALSUP
UNITED STATES DISTRICT JUDGE